

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Barbara Jean Sims : Chapter 13  
Debtor(s) : Bankruptcy No. 21-12240-amc

**DEBTOR(S) MOTION FOR EXTENSION OF TIME**

Debtor(s), **Barbara Jean Sims** through his/her/their attorney, Timothy E. Wilfong, Esquire, hereby requests an extension of fourteen (14) days to file all required documents and sets forth in support thereof as follows:

1. Debtor(s) filed the bankruptcy case on **August 13, 2021** without attaching all required documents.
2. The Court Ordered all required documents to be filed on or before **August 27, 2021**.
3. Debtor(s) has filed the Petition, Matrix and Certificate of Credit Counseling.
4. Debtor(s) filed an emergency bankruptcy petition on August 13, 2021 to stay the Sheriff sale of her home. The Sheriff sale had been scheduled for August 19, 2021. The Sheriff sale arose from a foreclosure action based on a delinquent sewer authority lien. Debtor requests additional time to collect the last remaining documents and information essential for the accurate and complete preparation of the outstanding bankruptcy schedules and the Chapter 13 Plan. Debtor is making diligent efforts to obtain the last remaining documents and information.

5. The movant does consent to the entry of a final order or judgment by the court if it is determined that the court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

WHEREFORE, it is respectfully requested that said extension of time be granted to file the required documents on or before **September 10, 2021**.

Respectfully Submitted,

/s/ Timothy E Wilfong  
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